

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorneys for Fuji Photo Film Co., Ltd.

In re:

JAZZ PHOTO CORP.,

Debtor.

Chapter 11

Case No. 03-26565 (MS)

**NOTICE OF MOTION FOR AN ORDER FOR THE APPOINTMENT OF A CHAPTER 11
TRUSTEE PURSUANT TO 11 U.S.C. §1104**

TO: ALL PARTIES ON THE ANNEXED SERVICE LIST

COUNSEL:

PLEASE TAKE NOTICE that on _____, 2003, at _____ a.m. (the "Hearing"), or soon thereafter as counsel may be heard, Lowenstein Sandler PC and Stroock & Stroock & Lavan,

LLP, co-counsel to Fuji Photo Film Co., Ltd. ("Fuji"), shall move before the Honorable Morris Stern at the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, seeking the entry of an Order directing the appointment of a Chapter 11 trustee in this case pursuant to 11 U.S.C. §1104.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the Application and Declarations of Bruce Buechler and Ellen G. Brier submitted herewith. No brief is necessary as the factual and legal basis for the relief requested is adequately set forth in the Application. A proposed form of Order is submitted herewith. Oral argument is hereby requested.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be in writing and filed and served no later than seven (7) days prior to the Hearing date or the date set forth in the Court's Order Shortening Time. In the event that no objections are timely filed, the relief requested in this Motion may be granted.

Respectfully yours,

LOWENSTEIN SANDLER PC
Co-counsel to Fuji Photo Film Co., Ltd.

By: /s/ Bruce Buechler
Bruce Buechler

Dated: June 24, 2003